Simona K. Suh
Barry P. O'Connell
Attorneys for Plaintiff
SECURITIES AND EXCHANGE COMMISSION
New York Regional Office
Brookfield Place
200 Vesey Street, Suite 400
New York, NY 10281
(212) 336-0103 (Suh)
Email: suhs@sec.gov

## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

#### SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

16-CV-09403-KM-JBC

-against-

NARIS CHAMROONRAT, YANIV AVNON, RAN ARMON, G SIX TRADING Y.R LTD., and ADAM L. PLUMER,

Defendants,

-and-

NKO HOLDINGS CO. LTD.,

Relief Defendant.

## PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULTS AGAINST DEFENDANTS YANIV AVNON, RAN ARMON, AND G SIX TRADING Y.R LTD.

Pursuant to Rule 55 of the Federal Rules of Civil Procedure, and for the reasons set forth in the accompanying Affidavit of Barry P. O'Connell, Esq., Plaintiff Securities and Exchange Commission (the "Commission") respectfully requests that the Clerk of this Court enter defaults against Defendants Yaniv Avnon ("Avnon"), Ran Armon ("Armon"), and G Six Trading Y.R Ltd. ("G6").

The Commission filed an Amended Complaint against Avnon, Armon, and G6 (in addition to the Defendants Naris Chamroonrat and Adam L. Plumer and Relief Defendant NKO Holdings Co. Ltd., which were named in the Commission's original complaint), on May 11, 2017. (See Amended Complaint, DE 10.) Avnon, Armon, and G6 were then each served with the Summons and the Amended Complaint. (See Proof of Service, DEs 15, 16 & 17.) All three Defendants failed to file a responsive pleading before their initial answer deadlines of July 7, 2017 (Armon) and July 21, 2017 (Avnon and G6).

On September 12, 2017, on these Defendants' request, the Court extended their answer deadlines to November 1, 2017. (See Order, DE 19.)

No answer or other responsive pleading or motion has been filed by Avnon, Armon, or G6, and their time to respond to the Amended Complaint has now passed.

Accordingly, the Commission respectfully requests that the Clerk enter defaults against each of Avnon, Armon, and G6.

Respectfully submitted,

Simona K. Suh

SECURITIES AND EXCHANGE COMMISSION

New York Regional Office

**Brookfield Place** 

200 Vesey Street, Suite 400

New York, New York 10281-1022

(212) 336-0103

suhs@sec.gov

Dated: July 26, 2018

### UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

16-CV-09403-KM-JBC

-against-

NARIS CHAMROONRAT, YANIV AVNON, RAN ARMON, G SIX TRADING Y.R LTD., and ADAM L. PLUMER,

Defendants,

-and-

NKO HOLDINGS CO. LTD.,

Relief Defendant.

# AFFIDAVIT OF BARRY P. O'CONNELL IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULTS AGAINST DEFENDANTS YANIV AVNON, RAN ARMON, AND G SIX TRADING Y.R LTD.

- I, Barry P. O'Connell, declare under penalty of perjury that the following facts are true and correct to the best of my information and belief.
  - 1. I am an attorney for the Plaintiff in this action.
  - Plaintiff filed its Complaint on December 21, 2016, and filed its Amended Complaint on May 11, 2017. The Amended Complaint added claims against Defendants Yaniv Avnon ("Avnon"), Ran Armon ("Armon"), and G Six Trading Y.R Ltd. ("G6"). (See Complaint, DE 1, and Amended Complaint, DE 11.)
  - 3. On July 20, 2017, Plaintiff filed proof of service as to Defendant Armon, who was served with the Summons and the Amended Complaint in Thornhill, Ontario, Canada, on June

16, 2017. (See DE 15.)

- 4. On August 25, 2017, Plaintiff filed proof of service as to Defendants Avnon and G6, which were each served with the Summons and the Amended Complaint in Haifa, Israel, on June 30, 2017. (See DEs 16 & 17).
- 5. All three Defendants failed to file a responsive pleading before their initial answer deadlines of July 7, 2017 (Armon) and July 21, 2017 (Avnon and G6).
- 6. On September 12, 2017, on Defendants Avnon's, Armon's, and G6's request, the Court extended their answer deadlines to November 1, 2017. (See Order, DE 19.)
- 7. Since that time, Defendants Avnon, Armon, and G6 have failed to plead or otherwise respond to the Amended Complaint, nor have they made any other pleading, or appearance, or request for additional time to respond to the Amended Complaint in this action.
- 8. Accordingly, Defendants Avnon, Armon, and G6 are in default.

Dated: July 26, 2018 SECURITIES AND EXCHANGE COMMISSION

By:

Barry P. O'Connell Brookfield Place 200 Vesey Street, Suite 400 New York, New York 10281-1022 (212) 336-9089 oconnellb@sec.gov

### **CERTIFICATE OF SERVICE**

I hereby certify that on July 26, 2018, I caused the foregoing to be served on Defendants Yaniv Avnon, Ran Armon, and G Six Trading Y.R Ltd. via UPS and email as follows:

### Yaniv Avnon and G Six Trading Y.R Ltd.

yanivavnon@gmail.com 65 Derech Ha Yam Haifa, Israel

### Ran Armon

ranarmon@hotmail.com ranarmon@gmail.com 130 Lisa Crescent Thornhill, ON L4J 2N3 Canada

Dated: July 26, 2018

Simona K. Suh

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New York Regional Office

**Brookfield Place** 

200 Vesey Street, Suite 400

New York, New York 10281-1022

Shoh

(212) 336-0103

suhs@sec.gov